

REMARKS

Claims 1, 3-6 and 8-10 are rejected under 35 U.S.C. 102(e) as being anticipated by Bridgelall (US Publication 2002/0085516 A1). Applicants respectfully disagree. A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. See MPEP § 2131.

Bridgelall does not disclose Applicants' claim 1 limitations of "(b) in response to step (a), the mobile station issuing a registration request to the serving MSC for the WLAN," "(c) in response to step (b), the serving MSC for the WLAN causing the WWAN to recognize that the mobile station is registered with the serving MSC for the WLAN and that the mobile station is no longer served by a prior MSC" and "(d) the mobile station communicating to entities outside of the WLAN by communicating with the WLAN via a WLAN protocol and the WLAN communicating with the WWAN via the serving MSC for the WLAN."

The Examiner cites Bridgelall paragraph 0075 for the above teachings. However, paragraph 0075 teaches a process of roaming from WLAN to WWAN when a dual mode terminal senses degradation in the WLAN (high packet error rates, frequent rates scale back, consistent signal strength degradation). The terminal issues a seamless vertical roaming (SVR) command as soon as the WWAN radio subsystem registers to the WWAN network. These teachings do not read on Applicant's method of managing mobility of a mobile station across a WLAN and a WWAN in which an MSC has been provisioned to act as a serving MSC for the WLAN. In particular, Bridgelall does not teach steps b) – d) of Applicants' claim 1, all of which involves requests to and/or actions taken by the serving MSC for the WLAN. Bridgelall's processes of seamless vertical roaming between a WLAN and a WWAN make no mention of requests to and actions taken by a serving MSC for a WLAN.

In view of the foregoing remarks, Applicants submit that Bridgelall does not teach the limitations of independent claim 1. Applicants also submit that dependent claims 2-12 are allowable by virtue of their dependency on claim 1. Applicant requests the reconsideration and reexamination of this application and

the timely allowance of the pending claims. Please charge any fees associated herewith, including extension of time fees, to **50-2117**.

Respectfully submitted,
Sundar, Rangamani, et al.

SEND CORRESPONDENCE TO:

Motorola, Inc.
Law Department

Customer Number: **22917**

By: /Lalita Pace/

Lalita W. Pace
Attorney for Applicant
Registration No.: 39,427
Telephone: 847-538-5855
Fax: 847-576-3750